

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

FRANKLIN C. EDMONDS

(Full name of plaintiff(s))

Case Number

09 C 315 C

VS

(Supplied by clerk)

RAWSON CONTRACTORS INC.

(Full name of defendant(s))

COMPLAINT

A. JURISDICTION

1. FRANKLIN C. EDMONDS, resides at
(Plaintiff)

1738 BOTT STREET, at MADISON, WI. 53704
(Address) (City, State)

2. Defendant RAWSON CONTRACTORS INC. is employed as
(Name of First Defendant)

at N 48 W 22953 Commerce Centre Dr.
(Position and Title, if any) (Address)

3. Defendant is employed as
(Name of Second Defendant)

at
(Position and Title, if any) (Address)

B. CAUSE OF ACTION

On the space provided on the following pages, tell what specific incidents or conversations occurred which led you to believe your constitutional or federal rights have been or are presently being violated. IT IS IMPORTANT THAT THE ALLEGATIONS BE BRIEF, BUT SPECIFIC. Do not cite legal authorities, such as earlier court decisions or laws enacted by the legislature or Congress, to support your lawsuit at this early stage of your case.

- ① On April 11, 2006 I was referred by Operating Engineers Co. 139 to Rawson Contractors Inc. in Milwaukee for a Rubber Tire Loader Job Referral. I was told to call Rawson's Superintendent Phil Verville. When I spoke with him I felt very intimidated when he ask me how good of a Rubber Tire Loader operator was I. My response was I have been operating equipment for 28 yrs. and have lots of experience in water and sewer work.
- ② After speaking with him, he gave me bad directions to Rawson's office. When I finally arrived I was given a application by one of the receptionist, in which I was very surprise.
- ③ Once completing the application and looking forward to speak with Phil Verville, I was informed that he left the office before I got there.
- ④ I was given his business card and ask to call him at 3:30 p.m. that day. I did call Phil Verville around 3:30 that day, but was unable to reach him. I left a message for him to

CALL ME. FROM THAT DAY UNTIL NOW I HAVEN'T HEARD OR SPOKE WITH PHIL VERVILLE.

⑤ THE JOB WAS WATER AND SEWER THAT CALLED FOR MONOCITY PARTICIPATION AND WAS TO LAST THE REST OF THE CONSTRUCTION SEASON. WHEN I SPOKE WITH PHIL VERVILLE HE KNEW I WAS (AFRICAN AMERICAN).

⑥ ON APRIL 18, 2006 I FILED A COMPLAINT WITH THE DEPARTMENT OF WORKFORCE DEVELOPMENT EQUAL RIGHTS DIVISION AGAINST RANSON CONTRACTORS INC. ALLEGING EMPLOYMENT DISCRIMINATION AND DENYING ME 2HRS. SHOW-UP TIME.

⑦ ON MAY 9, 2006 A GRIEVANCE WAS FILED BY OPERATING ENGINEERS CO. 139 ON MY BEHALF AGAINST RANSON FOR VIOLATING THE REFERRAL ARTICLE AND/OR OTHER PROVISIONS.

⑧ I WAS CONTACTED BY THE EQUAL RIGHTS DIVISION INFORMING ME TO FILE A MORE EXPLAINABLE COMPLAINT. ON MAY 23, 2006 I FILED A MORE EXPLAINABLE COMPLAINT AT THEIR REQUEST.

SEE ATTACHMENT A

C. REQUEST FOR RELIEF

1. I _____ request that I be allowed to commence this action without
(do, do not)
prepayment of fees and costs, or security therefor, pursuant to 28 U.S.C. §1915. The
attached affidavit of indigency has been completed and is submitted in support of this
request for leave to proceed in forma pauperis.

2. In the following space, please indicate exactly what it is you wish this court to do.
To Rule in my favor that RAWSON CONTRACTORS INC.
REFUSED TO HIRE ME BECAUSE OF MY RACE WHICH IS
AFRICAN AMERICAN. I ALSO WOULD LIKE FOR THE COURT
TO DENY RAWSON CONTRACTORS INC. TO BID OR RECEIVE
ANY CONTRACTS THAT HAS PUBLIC MONEY. TO INSURE
THAT RAWSON CONTRACTORS INC. DO NOT BID ON
CONTRACTS WITH PUBLIC MONEY UNDER A OTHER
NAME. SEE ATTACHMENT-B

Dated this 19 day of MAY, 2009.

Franklin C. Edmonds
(Signature)

1738 Roth Street
(Street or PO Box)

Madison, WI. 53704
(City, State Zip Code)